

The Cardoza Law Corporation

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Attorneys for Plaintiff,

David Mitre

**UNITED STATES DISTRICT COURT
FOR THE
EASTERN DISTRICT OF CALIFORNIA**

DAVID MITRE,

Plaintiff,

v.

**WAKEFIELD AND
ASSOCIATES, LLC,**

Defendant.

Case No.: 1:22-cv-00884-ADA-BAM

**JOINT STIPULATION
TO EXTEND TIME FOR PARTIES
TO FILE FOR DISMISSAL &
~~{PROPOSED}~~ ORDER**

**CURRENT DISMISSAL
DOCUMENTS FILING DEADLINE:
AUGUST 21, 2023**

**NEW DISMISSAL DOCUMENTS
FILING DEADLINE: OCTOBER 20,
2023**

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IT IS HEREBY STIPULATED AND AGREED to by Plaintiff Harout Handian and Defendant Wakefield and Associates, LLC that:

1. On April 26, 2023, Plaintiff filed a Notice of Settlement.
2. On July 7, 2023, the Parties requested additional time to finalize the settlement agreement, and asked the Court to extend the deadline to file the appropriate dispositional documents to July 7, 2023.
3. The Parties have finalized the settlement agreement. However, due to unforeseen delays, no formal agreement has been signed yet by Defendant.
4. The Parties seek additional time to file the correct dispositional documents. Good cause exists for the proposed extension of this deadline because Plaintiff and Defendant both require additional time in order to fulfil their obligations to the settlement agreement.
5. The Parties request that the deadline for filing for dismissal be extended from August 21, to October 20, 2023.

IT IS SO STIPULATED.

DATED: August 21, 2023

THE CARDOZA LAW CORPORATION

BY: /s/ LAUREN B. VEGGIAN

LAUREN B. VEGGIAN, ESQ.

ANGELY C. GAVIOLA, ESQ.

ATTORNEYS FOR PLAINTIFF

DAVID MITRE

GORDON REES SCULLY

MANSUKHANI, LLP

DATED: August 21, 2023

BY: /s/ SEAN P. FLYNN

SEAN P. FLYNN, ESQ.

ATTORNEY FOR WAKEFIELD AND

ASSOCIATES, LLC

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STIPULATION TO EXTEND TIME FOR PARTIES TO FILE FOR DISMISSAL &
~~PROPOSED~~ ORDER

ORDER

Pursuant to the stipulation of the Parties and good cause appearing, the parties shall file for dismissal on or before October 20, 2023. The Court will not grant further continuances, absent good cause, which will be narrowly construed.

IT IS SO ORDERED.

Dated: August 21, 2023

/s/ Barbara A. McAuliffe
UNITED STATES MAGISTRATE JUDGE